

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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DJ MANUFACTURING CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	CIVIL NO. 97-1457(JAG)
	:	
TEX-SHIELD, INC.;	:	
XYZ INSURANCE COMPANIES,	:	
	:	
Defendants.	:	
-----	X	

**Motion for Leave to File a Reply Memorandum
in Further Support of Tex-Shield, Inc.'s
Urgent Motion to Compel Deposition in
Aid of Execution of Judgment and for Sanctions**

COMES NOW DEFENDANT Tex-Shield, Inc. ("Tex-Shield") through its undersigned counsel and respectfully alleges and prays.

On or about November 24, 2004 plaintiff D.J. Manufacturing Corporation ("DJ") filed an Opposition to Tex-Shield's Urgent Motion to Compel Deposition in Aid of Execution of Judgment, and for Sanctions (the "Opposition"). Tex-Shield understands that a brief reply to said opposition is required, so as to bring to this Court's attention, among other things, that DJ has not filed a supersedeas bond in this case. Tex-Shield's Reply Brief is being filed and tendered herewith.

WHEREFORE, pursuant to Rule 7(c) of the Local Rules of the United States District Court for the District of Puerto Rico, Tex-Shield hereby requests leave to file a reply memorandum to DJ's Opposition.

Respectfully submitted in San Juan, Puerto Rico on this 3rd day of
December 2004.

I hereby certify that on December 3, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of the filing to the following: Eugene F. Hestres, Esq. and Alicia Santos, Esq., Bird, Bird & Hestres, P.O. Box 9023128, San Juan, Puerto Rico 00902-3128; and will separately mail to Marc Lamer, Esq., Kostos & Lamer, P.C., 1608 Walnut Street, Suite 1300, Philadelphia, Pennsylvania 19103.

s/ Pedro Jiménez

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